CLERK'S OFFICE U.S. DIST. COURT AT ROANOKE, VA FILED

AUG 0 8 2019

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

B	JULIA C. [/: DEPL	UDLEY,	CLERK
	DEPL	MY CLE	RK

UNITED STATES OF AMERICA)	Criminal No. 4:19 cn 29	
V.)		
)	In violation of:	
MAURICE V. HOWARD)) 18 U.S.C. § 1365(a),(e),	
DEVIN JAMAR STOCKTON)	18 U.S.C. § 875(d)	
		Under Seal	

INDICTMENT

COUNT ONE

The Grand Jury charges that:

- 1. From on or about February 2019 and continuing until March 26, 2019, the defendants, MAURICE V. HOWARD and DEVIN JAMAR STOCKTON, in the Western District of Virginia and elsewhere, did knowingly conspire and agree together and with other persons known and unknown to the Grand Jury, with reckless disregard for the risk that another person would be placed in danger of death or bodily injury and under circumstances manifesting extreme indifference to such risk, to tamper with a consumer product, that is a commercial meat product, which product affects interstate and foreign commerce, by urinating and conspiring to urinate on the product and within the plant where the product is manufactured, and intentionally engaged in conduct in furtherance of that offense.
- 2. MAURICE V. HOWARD and DEVIN JAMAR STOCKTON did knowingly, unlawfully, and willfully combine, conspire, confederate and agree with each other to tamper

with commercial meat product at the Monogram Food Solutions, LLC ("Monogram")
manufacturing plant at 200 Knauss Drive Martinsville, VA in violation of Title 18, United States
Code, Section 1365.

- 3. The manner and means utilized to accomplish the objects of the conspiracy included, among others, urinating onto commercial ready-to-eat meat product inside the Monogram manufacturing plant while video recording such act, as well as contaminating the environment of the Monogram manufacturing plant by urinating on a door and doorjamb while video recording such act.
- 4. In furtherance of the conspiracy and to achieve the objects therefor, the following overt acts, among others, were committed within the Western District of Virginia and elsewhere:

 On or about February 21, 2019, MAURICE V. HOWARD did urinate onto commercial ready-to-eat meat product and DEVIN JAMAR STOCKTON did participate in recording, using an iPhone, HOWARD urinating on a door and doorjamb inside the Monogram manufacturing plant.
 - 5. All in violation of Title 18, United States Code, Section 1365(e).

COUNT TWO

The Grand Jury further charges that:

- 6. Paragraphs 2-4 of the Indictment are re-alleged and incorporated herein by reference.
- 7. On or about February 21, 2019, in the Western District of Virginia, the defendants, MAURICE V. HOWARD and DEVIN JAMAR STOCKTON, with reckless disregard for the risk that another person would be placed in danger of death or bodily injury and

under circumstances manifesting extreme indifference to such risk, did tamper with a consumer product, that is a commercial meat product, which product affects interstate commerce, by means of urination.

8. All in violation of Title 18, United States Code, Section 1365(a).

COUNT THREE

The Grand Jury further charges that:

9. Between on or about March 1, and on or about March 6, 2019, in the Western District of Virginia, the defendant, MAURICE V. HOWARD with intent to extort from a person, firm, association and corporation, money and other things of value, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the property and reputation of Monogram

and Packers Sanitation Services Inc. and certain persons associated therewith.

10. All in violation of Title 18, United States Code, Section 875(d).

A TRUE BILL, this **b** day of August, 2019.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

THOMAS T. CULLEN \
UNITED STATES ATTORNEY